

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

SEALED

FILED

NOV 09 2021

PATRICK KEANEY
Clerk, U.S. District Court

By Deputy Clerk

SEALED

Case No.

CR 21-352 RAW

UNITED STATES OF AMERICA,

Plaintiff,

v.

LANCE KEITH MAYTUBBY, SR.,

Defendant.

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(A), 1151 & 1153]

Between in or about June 2016, and June 19, 2018, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis and the vulva of R.L., who had not attained the age of 12 years, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(A), 1151 and 1153.

COUNT TWO

AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(B), 1151 & 1153]

Between in or about June 2016, and June 19, 2018, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the penis and the mouth of R.L., who had not attained the

age of 12 years, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(B), 1151 and 1153.

COUNT THREE

**AGGRAVATED SEXUAL ABUSE IN INDIAN COUNTRY
[18 U.S.C. §§ 2241(c), 2246(2)(D), 1151 & 1153]**

Between in or about June 2016 and June 19, 2018, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: intentionally touching, directly and not through the clothing, the genitalia of R.L., who had not attained the age of 12 years, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2241(c), 2246(2)(D), 1151 and 1153.

COUNT FOUR

**SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY
[18 U.S.C. §§ 2243(a), 2246(2)(A), 1151 & 1153]**

Between in or about June 20, 2018, and July 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis and vulva of R.L., a person who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a) & 2246(2)(A), 1151 & 1153.

COUNT FIVE

**SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY
[18 U.S.C. §§ 2243(a), 2246(2)(B), 1151 & 1153]**

Between in or about June 20, 2018, and July 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the mouth and the vulva of R.L., a person who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a), 2246(2)(B), 1151 & 1153.

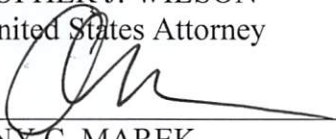
COUNT SIX

**ABUSIVE SEXUAL CONTACT IN INDIAN COUNTRY
[18 U.S.C. §§ 2244(a)(5), 2246(3), 1151 & 1153]**

Between in or about September 2017, and September 2, 2019, within the Eastern District of Oklahoma, in Indian Country, the defendant, **LANCE KEITH MAYTUBBY, SR.**, an Indian, did knowingly engage in and cause sexual contact as defined in Title 18, United States Code, Section 2246, to wit: intentional touching through the clothing of the genitalia of Z.L., who had not attained the age of 12 years, with an intent to abuse, humiliate, harass, degrade, arouse, and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2244(a)(5), 2246(3), 1151 and 1153.

A TRUE BILL:

CHRISTOPHER J. WILSON
Acting United States Attorney



ANTHONY C. MAREK
State Bar of Michigan #P76767
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY